

**CRITICAL AREA COMMISSION  
CHESAPEAKE AND ATLANTIC COASTAL BAYS  
1804 West Street, Suite 100  
Annapolis, Maryland 21401**

**GOLF COURSES IN THE RCA  
Final  
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**Introduction**

The Critical Area Criteria require that lands be classified into one of three management designations based on certain characteristics of land use that existed as of December 1, 1985 (for the Chesapeake Bay Critical Area) and June 1, 2002 (for the Atlantic Coastal Bays Critical Area). The Criteria describe the three designations and provide mapping criteria, policies, and development standards for each classification. The Criteria also address various land uses that are generally not permitted in the Critical Area, may be permitted only in Intensely Developed Areas, and may not be permitted in the Resource Conservation Area.

Approximately 80 percent of the Critical Area is designated Resource Conservation Area (RCA), so restrictions and limitations on land uses in the RCA are significant elements of the overall resource protection and conservation goals of the Critical Area Program. Generally, the law and Criteria prohibit new commercial, industrial and institutional uses in the RCA unless growth allocation is used. However, due to the variety of uses permitted in local zoning districts underlying the RCA, the Commission works closely with various jurisdictions to develop individual lists of land uses permitted in the RCA and to assist them with evaluating specific project proposals for consistency with the RCA provisions, characteristics, and policies in the Criteria.

In developing and analyzing lists of uses and specific project proposals, the Commission has often discussed golf courses and whether they can be designed and developed in a manner that is consistent with the defined land uses of the RCA (nature-dominated environments and resource utilization activities). Discussion also centered on whether the development of a golf course on RCA lands requires the use of growth allocation. The Commission has previously determined that the structural and usually impervious elements of a golf course such as access roads, clubhouses, pro-shops, restaurants, and parking lots should be located outside the RCA or require the use of growth allocation. The issue of consistency with the defined RCA uses generally concerns the remainder of the course: the tees, fairways, greens, and protective buffers between them. In a very broad sense, these areas can be viewed as “undeveloped” in that they are pervious, allow infiltration, support vegetation, and in some cases provide wildlife habitat and water quality functions.

Several jurisdictions include golf courses as a land use that is potentially permitted in the RCA in their local land use regulations, and the Commission has reviewed several projects involving golf courses. However, except for the Queenstown Harbor Golf Links in Queen Anne’s County, these projects have involved the use of growth allocation for the golf course. When the Commission

evaluated the Queenstown Harbor Golf Links project, their review resulted in specific site characteristics and design standards for the project. Since that time, there have been no projects or proposals before the Commission that warranted a more formal approach. At this time, the Commission finds it necessary to review their actions on these prior projects and clarify the specific characteristics of a golf course that would make it an appropriate RCA use. The purpose of this paper is to summarize the Commission's discussion and action on prior golf course projects in an effort to identify the specific site conditions, design standards, maintenance strategies, and management measures that the Commission believes are necessary when a golf course is developed in the RCA. The purpose of these conditions, standards, and strategies is to ensure that a golf course in the RCA is developed to fully comply with the goals, objectives, and policies of the Critical Area law and Criteria for land use in the RCA.

### **Criteria Requirements**

Resource Conservation Areas are defined in COMAR §27.01.02.05 as "those areas characterized by nature-dominated environments (that is wetlands, forests, abandoned fields) and resource utilization activities (that is agriculture, forestry, fisheries activities, or aquaculture). These areas shall have at least one of the following features:

- (1) Density is less than one dwelling unit per 5 acres; or
- (2) Dominant land use is in agriculture, wetland, forest, barren land, surface water, or open space".

In reviewing these features, it is plausible that open areas of a golf course could be loosely classified as "open space" and considered as satisfying a defined RCA use, particularly if the course also included other nature-dominated environments like forests and wetlands. This classification and determination would need to take into consideration the specific design of the course and the overall characteristics of the course relating to the extent of the course that was "managed" versus "natural."

In making decisions about land use and development in the Critical Area, the Commission has consistently used and continues to use the goals of the Critical Area Program set forth in §8-1808(b) of the Natural Resources Article of the Annotated Code of Maryland. The goals of the Critical Area Program are:

- (1) To minimize adverse impacts on water quality that result from pollutants that are discharged from structures or conveyances or that have run off from surrounding lands;
- (2) To conserve fish, wildlife, and plant habitat;
- (3) To establish land use policies for development in the Critical Area which accommodate growth and also address the fact that, even if pollution is controlled, the number, movement, and activities of persons in that area can create adverse environmental impacts.

The Commission has also followed the policies in COMAR 27.01.02.05 for land designated RCA:

- (1) Conserve, protect, and enhance the overall ecological values of the Critical Area, its biological productivity, and its diversity;

- (2) Provide adequate breeding, feeding, and wintering habitats for those wildlife populations that require the Chesapeake Bay, its tributaries, or coastal habitat in order to sustain populations of those species;
- (3) Conserve the land and water resource base that is necessary to maintain and support land uses such as agriculture, forestry, fisheries activities, and aquaculture; and
- (4) Conserve the existing developed woodlands and forests for the water quality benefits that they provide.

These criteria provide an overall framework for analyzing a golf course to determine if a particular course qualifies as an RCA use. Conceivably, a project could be specifically designed, developed, maintained, and managed to promote these policies while still accommodating the golf course use. Essentially, the use of land for playing the game of golf can be balanced equally and effectively with the conservation, habitat protection, and water quality goals of the Critical Area Criteria.

## **Discussion**

Golf courses can provide substantial areas of open space, as well as, areas of terrestrial, wetland, and aquatic wildlife habitat. This function is magnified when golf courses provide important linkages to larger areas of open space, diverse wildlife habitats, and other land designated RCA. Golf courses can comprise wildlife corridors, provide riparian habitat, and function as avian flyways. At the time of initial mapping, the Commission approved local jurisdictions' designations of some existing golf courses as RCA and some golf courses as LDA. Generally, it appears that the Commission determined that some golf courses were developed in such a way as to conserve and protect large areas of open space, to provide significant areas of protected habitat, and to provide important ecological linkages to surrounding properties designated RCA. This past action lays the groundwork for the Commission to evaluate specific proposals and make decisions about the location of a new golf course in the RCA without the use of growth allocation.

Golf courses can be specifically designed to balance an economically viable use of land with conservation and resource protection. If this balance is to be accomplished, it is important that the resource protection and conservation functions of the course be priorities throughout the design and development of the course, and that the course be managed and maintained in a manner that is consistent with these functions. The course must be designed to create desirable playing conditions that do not adversely impact sensitive ecosystems or natural features and to provide significant areas of protected habitat. The Commission recognizes that because of the presence of certain resources, the configuration of certain sites, or the size of certain properties, it may not always be feasible or practical to develop a golf course that accommodates the dual function of golf and resource protection. In these instances, the golf course would require the use of growth allocation.

## **History**

The Commission has discussed this issue on several occasions as various proposals have been brought before it. The most intensive evaluation of the appropriateness of golf courses as an RCA use took place in the spring of 1990. At that time, at the request of Queen Anne's County, the Commission was asked to interpret the Critical Area law and Criteria as to whether golf courses could be permitted in the RCA. The source of the request was the County's review of the Queenstown Harbor Golf Links.

A panel of Commission members considered 15 hours of testimony heard over two days of public hearings in addition to reports prepared by Commission staff. (Tom Deming, counsel for the Commission, assisted the members in analyzing the information collected.) Although the Commission had a specific proposal before it to use for discussion purposes, it was not acting in an official capacity to approve the project. The Commission's charge was to determine if the proposed use was consistent with the goals of the RCA designation by considering the effect of the use on the RCA in terms of water quality, habitat, and people-caused environmental impacts. The Commission acted to interpret the regulations. In support of its interpretation, the Commission provided specific design standards, project characteristics, and management recommendations on the Queenstown Harbor Golf Links Project.

The Commission discussed the existing agricultural use of the property and the various water quality and habitat issues associated with it, as well as, the minimal areas of existing habitat and the lack of functioning Buffers. Especially significant to the Commission's consideration was that the course was designed to maintain a 300-foot setback from tidal waters and tidal wetlands, and that significant portions of this setback were to be forested or otherwise naturally vegetated. The Panel ultimately concluded that by providing a 300-foot riparian corridor, monitoring water quality and nutrient and pesticide application, and implementing appropriate stormwater management practices, the water quality and habitat value of the project site could potentially be improved (over the existing agricultural use of the land) by the development of the site with a golf course. The Panel believed that even with the golf course use and increased human activity, that there would be significantly larger and more optimally functioning areas of natural wildlife habitat with the development of the golf course.

In summary, the Commission voted to adopt the Panel's Special Report for the Queenstown Golf Links and approved the proposed golf course as a permitted use in the RCA with the following conditions:

1. *Dwellings shall not be developed within the Critical Area;*
2. *The existing dock area on Queenstown Creek shall not be used in conjunction with the public operation of the golf course*
3. *An analysis shall be performed to determine potential impacts to surface and groundwater quality. This shall be used as a basis to develop a monitoring program;*
4. *Monitoring of groundwater shall be conducted for pesticides and nitrates and the ponds shall be monitored for pesticides to ensure that concentrations do not exceed EPA water quality criteria. The monitoring program shall be developed by a qualified expert approved by the Critical Area Commission Chairman. This monitoring shall include a baseline study before any changes to the property occur.*
5. *An updated Integrated Pest Management Plan shall be reviewed by the Commission staff along with any future changes that occur. Chlopyrphos and Isophenphos shall be deleted from the pesticides to be used on the golf course. Carbofuran shall not be allowed for use on the portion of the property that is farmed within the Critical Area. (We recommend that it not be used on the site at all.)*
6. *The golf course shall not be lighted for nighttime use.*

### **Summary of Commission Review of Golf Course Projects**

During the Commission's consideration of the Queenstown Harbor Golf Links, there was discussion about how the Commission's consideration was limited "solely to the golf course proposed by the applicant at this site;" and that "the Commission is not precluded from denying or imposing conditions on a golf course proposed at a different site where the Commission determines that water quality and fish, plant and wildlife habitat would be adversely affected." The Commission envisioned that local governments proposing to permit golf courses in the RCA would either submit the specific project proposal to the Commission for review (like Queenstown) or develop specific standards for golf courses in the RCA that would be officially incorporated into the local Critical Area Program through the amendment process. What has taken place over the last several years is a combination of these concepts. Several local governments have added golf courses as a permitted use in the RCA; however, none have included specific standards for their design and development, which has resulted in the Commission being involved in the review of specific project proposals.

The Commission has reviewed several projects involving golf courses, both as a stand-alone project and as part of a larger mixed-use project. The Commission's consideration of the various proposals seems to be generally consistent with the process used at the time of original mapping. At that time, the Commission designated some golf courses as RCA and some golf courses as LDA. This distinction depended on the characteristics of the course itself and the amount and intensity of land use adjacent to, and within, each particular golf course. This decision, to base the Critical Area designation on a case-by-case analysis of the specific golf course, site, and surrounding development and infrastructure lays the groundwork for the Commission's decision-making on golf courses. The following is a summary of the Commission's consideration of projects involving golf courses:

#### ***Queenstown Harbor Golf Links - Queenstown***

***Reviewed June 6, 1990***

This project involved the development of an 18-hole golf course as a stand-alone golf course. (There is another adjacent 18-hole course located outside the Critical Area portion of the site). Original land use on the property was agricultural, and it consisted primarily of open fields. The project site was designated RCA and after extensive and lengthy analysis and deliberation as outlined in this document, the Commission determined that the golf course could be developed without the use of growth allocation. This project has been constructed.

#### ***Easton Club - Easton***

***Approved April 7, 1993***

This project involved a mixed-use development that included mixed residential development and an 18-hole golf course. Prior to development, the project site was in agricultural use and consisted of open fields with some forest. Growth allocation in the amount of 119 acres was used to change the entire Critical Area portion of the site from RCA to IDA. The project involved a design that integrated the golf course fairways with the residential development. All commercial components of the project were located in the Limited Development Area or outside the Critical Area. This project has been constructed.

***Hyatt Chesapeake Bay Resort - Cambridge      Approved September 1, 1999***

This project involved a mixed-use development that included a hotel, conference center, marina, residential units, and an 18-hole golf course. The property was owned by the State, and some portions of the site were in agricultural use, and most of the site was developed as a State hospital. Originally, some portions of the project site were considered IDA and other areas were considered RCA. When the land was transferred from State to private ownership, the designation of the developed portions of the property became IDA. Growth allocation in the amount of 174.86 acres was used to change the Critical Area designation of the agricultural portion of the property from RCA to IDA. The project involved a design that integrated the golf course fairways into the residential and commercial areas of the project. Portions of this project, including the golf course, have been constructed.

***Tudor Hall Village – Leonardtown      Approved October 4, 1998 and October 6, 1999***

This project involved a mixed use development that included a hotel and conference center, commercial and office uses, single and multi-family residential units, and an 18-hole golf course. The property was in agricultural use with some forested areas; however, it had been mapped as a Limited Development Area at the time of original mapping because the Town negotiated with the Commission regarding the status of an existing approval of a planned community on the site. The shoreline Buffer of the site was designated RCA. The Town and St. Mary's County requested, and the Commission approved the use of 35.69 acres of growth allocation for a portion of the site where the hotel and conference center were located. Although growth allocation was not required for the golf course because of the existing LDA designation, the Commission did review the golf course as a State project because the Maryland Stadium Authority was going to develop the golf course. The project involved a design that integrated the golf course fairways into the residential and commercial areas of the project. This project has not been constructed.

**Golf Course Design, Development, and Management in the RCA**

In order to facilitate effective and consistent analysis of golf course projects on a case-by-case basis, to determine the appropriateness of a specific proposal as an RCA use, the Commission has identified various design criteria and performance standards that will be used to evaluate them. The criteria and standards are comprehensive in order to ensure that the policies for RCA are applied in a manner that results in an appropriate and meaningful balance between the golf course use and resource conservation use of the land.

The Commission believes that development of a golf course in the RCA may be permitted without the use of growth allocation if the course is designed, developed, and managed in a manner consistent with the goals of the Critical Area Program and the criteria and policies for land use in the RCA. The Commission's emphasis is primarily on the design and development of the course; however, this policy includes recommendations to local governments regarding management, maintenance, and monitoring.

**Relationship to Other Development**

Frequently golf courses are designed with residential and/or commercial development intermingled with the fairways of the golf course. Generally moderate intensity residential, commercial, industrial, or institutional development that encroaches into a golf course is incompatible with the

habitat protection and water quality functions of the course. If a golf course is being promoted as consistent with the Critical Area Criteria's policies for the RCA, then sufficient land area must be maintained so that the policies can be followed. Even if it may be possible to locate low density residential development on the golf course at a density not exceeding one unit per 20 acres, this would be considered a compounding of permissible uses on the same RCA lands and would be inconsistent with the goals for resource protection in the RCA.

Residential, commercial, industrial, or institutional uses increase the number, movement, and activities of people in the area and generate pollutants that are not conducive to minimizing impacts on the defined land uses of the RCA. When these uses are intermingled with the golf course, they tend to fragment the RCA lands making them less viable in terms of the conservation, protection, and enhancement of the overall ecological values, biological productivity and diversity of the Critical Area.

In some instances, a golf course is an element of a larger mixed-use project involving other residential and/or commercial development. Frequently in these types of projects, the golf course is used to meet overall project requirements for recreation, open space, or conservation purposes. A golf course used to meet recreation, open space, or conservation requirements, or to generate density for a project involving a larger land area and other development indicates that the area of the golf course is not truly serving RCA land use purposes. Accordingly, the use of growth allocation for the golf course would be required. When the land area or acreage of a golf course is used for any of these purposes, which are clearly linked to non-RCA development, the land has become an essential and intrinsic part of a growth allocation project and part of the "development envelope." For this same reason, the golf course should not be used to meet development performance standards. The conservation and resource protection goals of RCA land use may become subordinate to compliance with design standards associated with non-RCA development.

### **300- Foot Setback**

Providing a 300-foot setback from tidal waters and tidal wetlands is a significant resource protection strategy that comprehensively addresses many of the policies for land use in the RCA. A natural buffer area between a golf course and tidal waters and tidal wetlands is beneficial from both wildlife and habitat perspectives. A 300-foot wide setback is generally considered to function optimally for a wide variety of wildlife species, reduce disturbance to hydric soils, and to provide significant water quality benefits. Planting the area, or otherwise establishing it in natural vegetation, can minimize the time it takes for the area to begin to function optimally and can enhance its suitability for native species of wildlife.

### **Enhanced Stream Buffers**

Stream buffers can create wildlife corridors that function to connect "natural areas" on a golf course to wildlife habitat off-site. Enhancing stream buffers that are connected to tidal waters or tidal wetlands to 150 feet on each side, so as to provide a vegetated wildlife corridor 300 feet wide, can enhance wildlife use and movement through the site and provide important connections to off-site habitat. Enhanced stream buffers also provide significant water quality benefits, especially on golf courses where nutrients, pesticides, and herbicides are applied regularly.

### **Structural Elements of the Golf Course**

Facilities related to the “commercial” aspect of the golf course should be located outside the RCA or should require the use of growth allocation. These uses include access roads, clubhouses, maintenance buildings where chemicals are stored and mixed, pro-shops, restaurants, and parking lots. In general new restaurants, retail uses, club-type facilities, and related parking areas are considered commercial uses and are not permitted in the RCA.

### **Stormwater Management**

Stormwater associated with development activities can alter the natural hydrology of areas and can adversely impact tidal and nontidal wetlands and waterways. Even when stormwater has been treated, stormwater discharges can adversely affect sensitive aquatic resources because of alterations in the quantity, velocity, and location of the discharges. In order for an area developed as a golf course to maintain its “RCA features,” any alteration of the natural hydrology should be carefully considered. In order to address any adverse impacts, surface and subsurface stormwater collection systems should be designed to direct stormwater internally for treatment and to avoid discharges to tributary streams, tidal waters, and tidal wetlands.

### **Coordination with Other Environmental Regulatory Programs**

Golf courses that are designed and developed as an RCA use should be maintained and managed in a manner that promotes the goals of the Critical Area Program and the policies in the RCA. Integrated Pest Management (IPM) Plans and nutrient management plans are tools that facilitate the management of fertilizers, herbicides, and pesticides used and the areas of the golf course that are intensively managed. IPM plans are generally required by the Maryland Department of the Environment (MDE) as part of the State’s water quality certification requirements. The application of fertilizers and nutrients are generally regulated by COMAR 15.20.06 and the Agriculture Article of the Annotated Code of Maryland §8-801 through §8-806 through the Maryland Department of Agriculture (MDA). Coordination with these regulatory agencies will be promoted by the Commission, and the Commission will seek comments from these agencies before making a decision on a golf course that is proposed to be located within the RCA without growth allocation.

### **Management Recommendations for Local Governments**

Several local governments require water quality monitoring on golf courses both prior to development and for a defined period after development. Water quality monitoring on a golf course can ensure that the course is being properly managed. Maintaining ongoing records provides a means to measure and document progress towards environmental improvement and demonstrates the course’s long term commitment to environmental stewardship and resource conservation. Monitoring can also be used to ensure that Best Management Practices and buffers are functioning properly. Because water quality monitoring is largely a component of golf course management and maintenance, it is an effort that is probably most appropriately addressed through a cooperative agreement between the jurisdiction’s local government and the golf course operator. The Commission strongly encourages local governments to require a water quality monitoring program as a condition of local project approval. The water quality monitoring program should include the submittal of an annual report that identifies water quality issues or problems and includes recommendations and a timetable for addressing them.



The local government should also encourage the golf course owner and operator to participate in environmental certification programs that promote sound environmental planning, effective wildlife and habitat management, a reduction in chemical use, water conservation, water quality management, safe chemical application, and public outreach and education. Certification programs provide technical assistance and professional guidance to golf course owners and operators that promote environmental stewardship and conservation.

### **Habitat Protection Areas**

The development of a golf course often involves extensive manipulation of the landscape and is generally not conducive to maintaining sensitive natural ecosystems that are dependent on specific soil types, soil structure, topography, vegetation, hydrology, and microclimate. The Critical Area law and Criteria require the conservation of designated Habitat Protection Areas (HPAs) including the habitats of threatened and endangered species and species identified as in need of conservation. Natural heritage areas, colonial water bird nesting sites, waterfowl staging and concentration areas, riparian forests, forest interior dwelling (FIDs) bird habitat and anadromous fish propagation waters are also identified as HPAs. For golf courses located in the RCA, the basic performance standards required for the disturbance of RCA lands may not always provide the optimum protection for designated habitat protection areas, particularly if extensive clearing and grading are proposed. If a golf course is proposed to be located in the RCA, and it involves significant impacts to a designated Habitat Protection Area, then growth allocation shall be required.

### **Environmental Features and Site Design**

The policies for land within the RCA require the conservation, protection, and enhancement of the biological productivity and diversity of the Critical Area. In order to ensure these objectives are met, a golf course located within the RCA should include sufficient land area for optimum protection of existing natural features and to make necessary environmentally sensitive adjustments or modifications based on actual site conditions. The project should also be designed so that required mitigation for forest clearing and any other environmental impacts associated with the development of the golf course can be accommodated on the project site.

## **STANDARDS FOR GOLF COURSE DESIGN AND DEVELOPMENT**

The development of a golf course on any parcel of land that is currently designated RCA and that is to retain the RCA designation pursuant to review and approval of the golf course development project by the local government shall be subject to review by the Critical Area Commission in accordance with the following standards. The golf course project shall be submitted to the Commission in accordance with COMAR 27.03.01. Projects may be presented to and discussed with the full Commission as part of the review process. Local governments proposing to approve the development of a golf course in the RCA without the use of growth allocation are encouraged to coordinate closely with the Commission during the early stages of project design and engineering.

### **Relationship to Other Development**

- The golf course shall be designed as a stand-alone project, and the course shall not be used to meet recreation, open space, or conservation requirements for other residential, commercial, industrial, or institutional development and shall not be used to meet development

performance standards such as stormwater management or impervious surface limits. The acreage of the course shall not be used to generate density or “commercial floor area” for a project involving a larger land area and residential, commercial, industrial, and institutional development.

- The portion of the RCA occupied by the golf course shall not be used for residential development or to generate density that will be transferred elsewhere within the RCA, even if the proposed dwelling units do not exceed the allowable one unit per 20 acres.
- Residential, commercial, industrial, or institutional development shall not be located along fairways, surround greens and tees, or otherwise be integrated into the golf course.
- All structural elements of the golf course including access roads, clubhouses, pro-shops, restaurants, and parking lots shall be located outside the RCA or require the use of growth allocation.

#### **Setbacks and Buffers**

- All developed areas (area within the limits of disturbance) of the golf course shall be set back 300 feet from tidal waters or tidal wetlands, and the setback maintained or planted with natural vegetation, unless the parcel configuration or other environmental considerations necessitate deviation to some minor extent, in which case growth allocation shall be deducted for that area.
- Stream buffers on the course shall be increased from the required minimum 100 feet to 150 feet from each bank to provide enhanced wildlife connections, unless the parcel configuration or other environmental considerations necessitate deviation to some minor extent, in which case growth allocation shall be deducted for that area. Fairways and cart paths shall be designed to minimize environmental impacts on the stream, including the number, location, configuration, and construction type of the crossings.

#### **Stormwater Management and Water Quality Protection**

Unless as noted below, stormwater management systems for the golf course shall be designed to:

- Minimize the generation of new impervious surfaces and stormwater runoff, and maximize pervious areas for stormwater treatment;
- Address both qualitative (e.g. Water quality volume, Recharge volume) and quantitative (e.g. Channel protection volume, 2-year or 10-year, etc.) sizing criteria. Post-development conditions should mimic the characteristics of wooded/forested lands in good hydrologic condition;
- Include subsurface collection systems on the tees and greens;
- Maximize the direction of stormwater internally for treatment and storage; and

- Minimize and pretreat all stormwater discharges to tributary streams, nontidal wetlands, tidal waters, and tidal wetlands.

In instances where parcel configuration or other environmental considerations necessitate minor deviation from these standards, growth allocation shall be deducted for those areas.

### **Habitat Protection Areas**

- The golf course shall be designed to minimize impacts to designated Habitat Protection Areas. If a golf course involves impacts to a designated Habitat Protection Area, other than the 100-foot Buffer, 150-foot Buffer, or 300-foot setback for access purposes, then growth allocation shall be required.

### **Coordination with Other Environmental Regulatory Programs**

- The Commission will request that MDE require that the golf course include the development and implementation of an Integrated Pest Management (IPM) Plan in which monitoring is used to identify problems and a variety of management options are considered to address these problems and avoid adverse environmental impacts.
- The Commission will request that MDA require that the golf course include the development and implementation of nutrient management practices that incorporate nutrient products and practices that reduce the potential for contamination of ground and surface water; for example, slow release fertilizers and organic products where appropriate.
- The Commission will request that MDE require that the golf course implement a water quality monitoring program. The water quality monitoring program shall include the submittal of an annual report that identifies water quality issues or problems and includes recommendations and a timetable for addressing them. The annual report shall be submitted to MDE, the Critical Area Commission, and the local government.

### **Management Recommendations for Local Governments**

- The Commission will request that local governments strongly encourage participation by golf course owners and operators in environmental certification programs that promote environmental stewardship, wildlife and habitat management, and public education and that serve to promote the goals of the Critical Area Program.